

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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April 8, 2003

BY E-MAIL AND
FIRST CLASS U.S. MAIL

Robert J. Keegan, Esq.
Cheryl M. Kimball, Esq.
Keegan, Werlin, & Pabian, LLP
21 Custom House Street
Boston, MA 02110

Re: Boston Gas Company d/b/a Keyspan Energy Delivery of New England, D.T.E. 03-14

Dear Mr. Keegan:

Enclosed is the First Set of Information Requests by the Department of Telecommunications and Energy to Boston Gas Company d/b/a Keyspan Energy Delivery of New England regarding the captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., April 22, 2003.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel
Hearing Officer

Enc.
cc: Mary Cottrell, Secretary

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. 03-14

FIRST SET OF INFORMATION REQUESTS TO
BOSTON GAS COMPANY d/b/a KEYSpan ENERGY DELIVERY OF NEW ENGLAND

The Department of Telecommunications and Energy ("Department") submits to Boston Gas Company ("Company") d/b/a Keyspan Energy Delivery of New England the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request refers to the Company's 2002 Service Quality ("SQ") report filed on March 3, 2003 ("Filing").
2. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer. Provide electronic versions of all your responses, including all calculations and worksheets. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed **but no later than April 22, 2003**.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or their witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "**historical data**" refers to data for the years **1992 through 2001**.
5. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
6. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

7. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
8. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit four (4) copies of the responses to Jody M. Stiefel, Hearing Officer, and (2) copies to Glenn Shippee, Rates and Revenue Requirements Division.

Requests

- DTE 1-1 In its March 1, 2002 SQ report filed pursuant to D.T.E. 99-84 (2001), the Company stated that it would report its performance under Boston Gas Company, D.P.U. 96-50 (1996) and D.T.E. 99-84. Does the Company's Filing report the Company's performance under D.P.U. 96-50? If not, please do so.
- DTE 1-2 Please refer to the Company's Filing at § II-1. Explain why the Company has presented staffing level figures for all of Keyspan's Massachusetts employees. Provide the Company's employee staffing levels.
- DTE 1-3 In its March 1, 2002 Service Quality Report, Att. 1, at 7, the Company reported 472 Consumer Division cases in 1997, 378 cases in 2000, an average of 706.3, a standard deviation of 386.8 and a benchmark of 1093.1. Please explain why these figures differ from those displayed in the Company's Filing at §§ I-1, II-1.
- DTE 1-4 Please refer to the Company's Filing at § I-1. The Company indicates that there is no penalty for the Service Appointment Kept measure. However, the Company's Filing at § III-1 indicates that the Company incurred a \$108,125 penalty for Service Appointments. Explain.
- DTE 1-5 For each of the areas for which Company did not meet its benchmark or is not within its deadband, please detail any necessary initiatives the Company has implemented to improve its performance.
- DTE 1-6 For each of the areas for which Company did not meet its benchmark or is not within its deadband, please detail any conditions under which the Company operated that would have influenced the results the Company achieved.
- DTE 1-7 Please detail the internal audits that have been conducted to assure the accuracy of Company data. If internal audits have not been performed, please indicate the Company's plans to perform such audits.

DTE 1-8 Please explain how each of the following SQ measures were recorded and measured:

- (a) Telephone Answer Factor;
- (b) Emergency Answering;
- (c) Service Appointments Kept;
- (d) Meter Reads;
- (e) Bill Adjustments;
- (f) Lost Time Accident Rate;
- (g) Response to Odor Calls;
- (h) Restricted Work Day Rate.

In your response, indicate if the Company faced any recording and measurement issues and how they were resolved. Provide documentation to support your answer.

DTE 1-9 Please explain why ten years of historical data is not available for the following SQ penalty measures and reporting requirements: Service Appointments; Meters Read; and, Restricted Work Days.

DTE 1-10 Please refer to Filing at §§ I-2, III-Att.1. Provide additional information regarding the Company's Customer Guarantee program, explaining for what reason payouts were made and how the Company made the program known to employees and customers.

DTE 1-11 Please provide calculations for all penalty and offset amounts.

DTE 1-12 Please refer to the Company's Filing at §§ I-1, III-Att.1. Does the number of consumer division cases and billing adjustments include only residential customers? If not, please provide information for only residential customers.